



EMPLOYERS COUNCIL  
OF MENDOCINO COUNTY

Public Comment  
Russian River Frost Regulation  
Deadline: 7/5/11 by 12:00 noon

July 4, 2011

VIA EMAIL



Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

RE: Comment Letter on the Proposed Russian River Frost Regulation

Dear Board Members:

The Employers Council of Mendocino County is a non-profit membership based trade association. We work to facilitate information to the community and membership regarding issues coming before government agencies that can affect the social and economic conditions in the County of Mendocino.

We strongly oppose the proposed Russian River Frost Regulation because it is an unjustified regulation.

We have received information from our members about how the proposed regulation is not based upon sound science, ignores private property rights and would jeopardize the fragile economic existence of agribusiness, tourism and lodging industries throughout Mendocino County and the Russian River watershed.

Perhaps the most troubling and perplexing part of this issue is the information received through multiple Freedom of Information Requests which contains evidence about the lack of transparency used by the regulatory agencies to devise this regulation without science and purposeful public input.

The Employers Council of Mendocino County is gravely concerned about how the Frost Protection Regulation would endanger jobs, small business opportunities, and tax base across several economic sectors. We would like to remind the Board about the rural nature of Mendocino County's economy and how local government tax base for public services is reliant on a healthy agribusiness sector because our rural economy is not as diversified as urban areas. Agribusiness and another key sector, tourism and lodging sectors, share the same customers who travel here for our agricultural history and products. Simply imposing a regulation behind closed doors, without the basis of science, and without meaningful public input is simply bad public policy making and an embarrassment to the State of California and its constituents who live and work in this portion of the State.

We ask the Board to vote NO and reject this unnecessary and unjustified Russian River Frost Protection regulation.

Sincerely,  
EMPLOYERS COUNCIL OF MENDOCINO COUNTY

*Barbara Reed*

Barbara Reed  
Chair

**Employers Council of Mendocino County**  
597B Main Street, Ukiah, CA 95482  
(707) 462-5021 ▪ (fax) 472-2502

CC: Mendocino County Farm Bureau